

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BUILDING SERVICE 32BJ HEALTH FUND,  
BUILDING SERVICE 32BJ LEGAL SERVICES  
FUND, BUILDING SERVICE 32BJ THOMAS  
SHORTMAN TRAINING, SCHOLARSHIP AND  
SAFETY FUND,

Plaintiffs,

-against-

UNION LABOR MAINTENANCE, INC. and its successors  
and/or its alter egos U-L MANAGEMENT, INC.;  
U-L MANAGEMENT; and John Reed,  
Michael McCarthy and Paul Searfoss d/b/a  
U-L MANAGEMENT

Defendants.  
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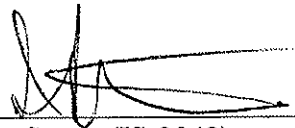
**NOTICE OF MOTION**  
08-CV-5022 (JSR)

PLEASE TAKE NOTICE that, upon the affidavit of Ira A. Sturm, sworn to on July 17, 2008, and the exhibits thereto, and upon the accompanying Memorandum of Law, plaintiffs, Building Service 32BJ Health Fund, Building Service 32BJ Legal Services Fund and Building Service Thomas Shortman Training, Scholarship and Safety Fund, collectively referred to as the “Funds”, by their counsel, will move this Court before The Honorable Jed S. Rakoff, United States District Judge, on August 15, 2008 at 10:00 AM or as soon thereafter as counsel may be heard, in courtroom 14-B of the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Federal Rules of civil Procedure 4, granting the Funds permission to serve the summons and complaint upon the defendants by electronic mail, facsimile transmission and certified and first class mail, and for a further order granting the Funds such other and further relief as may be appropriate in the circumstances.

PLEASE TAKE FURTHER NOTICE that pursuant to the Southern District of New York Local Civil Rule 6.1 (b), any opposing affidavits and answering memoranda shall be served within ten (10) days after service of these moving papers.

Dated: New York, New York  
July 18, 2008

Raab, Sturm, Goldman & Ganchrow, LLP

A handwritten signature in black ink, appearing to read 'Ira A. Sturm', is written over a horizontal line.

Ira A. Sturm (IS-2042)  
attorneys for the Plaintiffs  
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